

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, ILLINOIS 60604

DATE:

NOV, 1.17 2017.

SUBJECT:

CLEAN AIR ACT INSPECTION REPORT PPG Industries of Ohio, Circleville, Ohio

FROM:

Charles Hall, Environmental Engineer

AECAB (MN/OH)

THRU:

Brian Dickens, Section Chief

AECAB (MN/OH)

TO:

File

# **BASIC INFORMATION**

Facility Name: PPG Industries of Ohio

Facility Location: 559 Pittsburgh Road, Circleville, Ohio

Date of Inspection: 11 October 2017

#### **EPA Inspectors:**

1. Charles Hall, Environmental Engineer

2. Victoria Nelson, Environmental Engineer

#### Other Attendees

1. Jackie Landau, PPG ERU Manager Customer Services

2. Donna Howland, PPG, Environmental Specialist II

3. James Lute, PPG, Operations Engineer

Purpose of Inspection: tanks inspection

Facility Type: hazardous waste storage tanks for hazardous waste incinerator

**Regulations Central to Inspection:** The National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations, 40 C.F.R. Part 63, Subpart DD

Arrival Time: 8:25 A.M. Eastern Daylight Time Departure Time: 12:50 P.M. Eastern Daylight Time

#### **Inspection Type:**

☑ Unannounced Inspection☑ Announced Inspection

## **OPENING CONFERENCE**

The following information was obtained verbally from Landau, Howland, and Lute unless otherwise noted.

**Process Description:** PPG receives hazardous and non-hazardous waste from its facilities in the United States before incineration in its Energy Recovery Unit (ERU). PPG is also allowed to receive hazardous and non-hazardous waste from its facilities in Canada and Mexico, but currently does not. PPG stores liquid waste in 19 storage tanks. Four of the 19 storage tanks are located in PPG's resin plant. PPG also uses two control tanks to smooth out flow pressure from storage to the ERU. Further, PPG uses two overflow tanks to collect liquid waste in the event of a process upset in the ERU.

## **TOUR INFORMATION**

EPA toured the facility: Yes

**Data Collected and Observations:** The inspection team used a forward looking infrared (FLIR) camera to look for volatile organic hazardous air pollutants on the components of the 23 tanks. The inspection team observed a small, continuous emission stream from a flanged connection on Tank 1511 (Ohio Environmental Protection Agency emission unit number T018). PPG personnel tightened the bolts on the flange before EPA had the opportunity to measure the emission concentration. The inspection team did not observe evidence of a leak from any other tank.

**Photos and/or Videos:** were taken during the inspection. The inspection team recorded a short video of the flange before and after tightening the bolts on the flange where the FLIR camera saw a small leak on Tank 1521, and took one picture of the flange.

Field Measurements: were not taken during this inspection.

## **CLOSING CONFERENCE**

#### Requested documents:

The inspection team requested and received the following documents:

- Daily Inventory Report (summary);
- Daily Inventory Report (details);
- Inspection Report from Welding Consultants Inc. for Tank 1501;

- Laboratory Analysis Report for Tanks 1502 and 1518;
- Tank descriptions from the most recent comprehensive performance test; and
- Section D.2 Tank Systems of its current RCRA permit.

Concerns: Other than the small leak at one flanged connection on

The inspectors did not point out any deficiencies or concerns.

| Report Author:   | Charlie Sall  | Date: "/6/17  |  |
|------------------|---------------|---------------|--|
| Section Chief: _ | Bular Dishens | Date: 11/7/17 |  |

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# **APPENDIX A: DIGITAL IMAGE LOG**

| 1. Inspector Names: Charles Hall, | 2. Archival Record Location: G:\Air Enforcement An | ıd |
|-----------------------------------|--|----|
| Victoria Nelson                   | Compliance Branch\MI and WI\Nelson\PPG             |    |
|                                   | Circleville\Inspection 10.11.17                    |    |

| Image<br>Number | File Name    | Date and Time (incl. Time zone and DST) | Latitude and<br>Longitude | Description of Image                      |
|-----------------|--------------|---|---------------------------|---|
| 1               | MOV_2038.mp4 | October 11, 2017<br>11:22 AM ET         |                           | FLIR video of tank component leak         |
| 2               | MOV_2039.mp4 | October 11, 2017<br>11:25 AM ET         |                           | FLIR video of tank component after repair |
| 3               | PA110001.jpg | October 11, 2017<br>10:21 AM CT*        |                           | Leaking tank component                    |

<sup>\*</sup>The camera used was set to Central Time. The site was located in Eastern Time.